

US EPA RECORDS CENTER REGION 5



458678

MAY 22 1992

HSM-5J

Elaine Murtaugh, Director  
Regulatory Affairs  
Dexter Corporation  
7145 Pine Street, P.O.Box 200  
Chagrin Falls, Ohio 44022

Dear Ms. Murtaugh:

Thank you for your letter of January 6, 1992 regarding comments on the screening site inspection (SSI) report on the Mogul Corporation site. Your comments will be incorporated into the site file for further reference.

Based on our review of the SSI report, this site has been designated as NFRAP'd (No Further Remedial Action Planned) at this time. This concludes our site assessment activities. This decision may be changed if the Ohio Environmental Protection Agency were to submit new technical information about the site.

We would like to respond to your comment regarding the chemical analysis of the soil and residential well samples. We did detect the presence of target compounds and target analytes but at low levels. We also are unable to clearly attribute the compounds to the site. However, we do feel that there is a potential for these contaminants to migrate into the groundwater in the area. There is a low probability of this happening because of the above average impermeability of the soils in the area of the site. Consequently, we believe that the soils are retarding the contaminants from reaching the aquifer of concern. Therefore, the potential threat to the aquifer is very minimal.

We appreciate hearing that your company has taken action to safeguard the public and the environment. We ask that you continue to work with the OEPA's Twinsburg office to keep the regional groundwater safe from contamination. We hope this response addresses your concerns. Again, we will incorporate the comments supplied by you into the site project file.

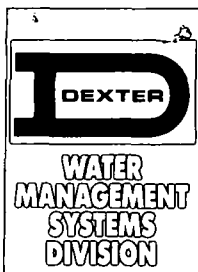
Sincerely yours,

William D. Messenger, Chief  
Site Assessment Section

bcc: Laura Fay, OEPA

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THE DEXTER CORPORATION

7145 PINE STREET • P.O. BOX 200 • CHAGRIN FALLS, OH 44022 • (216) 247-5000 • FAX: (216) 247-7175  
Executive Offices • Chagrin Falls, OH 44022

January 6, 1992

**RECEIVED**  
JAN 9 - 1991

Mr. William D. Messenger  
Pre-Remedial Unit  
U. S. EPA, Region 5  
230 S. Dearborn Street  
Chicago, IL 60604

**SITE ASSESSMENT  
SECTION**

Dear Mr. Messenger:

In 1984, the Ohio EPA performed a Preliminary Assessment of The Mogul Corporation property at 7145 Pine Street, Chagrin Falls, OH in response to our CERCLA 103(c) notification submitted in 1981. The Ohio EPA assigned the site a low priority for further investigation due to low potential for environmental impact. The United States EPA performed a follow-up screening site inspection (SSI) in 1989 including soil and ground water sampling.

The EPA SSI report submitted to The Mogul Corporation in 1990 provided no data indicating on site disposal practices which might affect human health or the environment. The semi-volatile organic compounds detected in the soil samples at residual levels are typical of coal storage residues. Coal was an important fuel source in the Chagrin Falls area earlier this century and residual levels of S-VOCs are common if not ubiquitous. The pesticides detected at residual levels have not been used in any manufacturing/blending process, and are likely related to local pesticide application for control of insects breeding in the low-lying areas of the Chagrin river drainage basin.

Only one volatile organic compound, 1,2-dichloroethane (DCA), was identified in on site production wells. The DCA was detected at levels slightly greater than the maximum contaminant level (MCL) in two wells.

Mogul does not presently and has not historically used or produced DCA; however, Mogul initiated a limited field investigation to evaluate ground water quality due to concern for employees and area residents. The investigation included soil gas vapor testing and placement of four ground water monitoring wells. Mogul also removed all USTs at the facility (four underground heating fuel oil storage tanks) to avoid any potential future impact on ground water.

. . . . continued



OVER 75 YEARS OF EXCELLENCE IN WATER MANAGEMENT

TO: Mr. William Messenger  
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Soil gas vapor results in the area of the former underground fuel oil tanks had indicated elevated total benzene equivalents. All tanks were removed in accordance with Ohio BUSTER guidelines. Each excavation showed some signs of fuel oil releases, however, all apparently affected soils were removed and analysis of post-excavation soil samples indicated no residual contamination (BTEX, TPH, % solids).

Monitoring well data indicated no detectable organic compounds. The placement of the wells (40 ft. depth) and local geology would indicate that had the contamination in the on site production wells (80 ft. depth) and area residential wells originated at Mogul, it would have also been detected in these monitoring wells.

In order to resolve concerns over the use of the production well water at our facility, Mogul has made arrangements for Chagrin Falls city water tie-in. With the assistance of the Ohio EPA, Twinsburg office, Mogul has completed its reporting requirements as a public water supply and taken its three production wells out of service. Data from our on site ground water investigation has been provided to the Ohio EPA, Twinsburg office, to assist them in their ongoing investigations of regional ground water contamination.

In light of this information, we request that The Mogul Corporation be assigned a **No Further Action** status on the US EPA CERCLIS list and be recommended as **ZERO** priority for the Ohio EPA Master Sites List.

Thank you for your consideration of this report. Please feel free to contact me if I may be of additional assistance.

Sincerely,



Elaine Murtaugh  
Director, Regulatory Affairs

EM/ew

Enclosure

cc: John Blatz  
Dick Fruit  
Hadley Hurford